



AUDUBON NATURALIST SOCIETY

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The Honorable Lisa P. Jackson
Administrator
U. S. Environmental Protection Agency
Water Docket, Mailcode: 28221T
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Chesapeake Bay TMDL -- Docket no. EPA-R03-OW-2010-0736

Dear Administrator Jackson:

I am writing on behalf of the membership of Audubon Naturalist Society, an organization founded in 1897 to steward the natural resources of the greater Washington, D.C. region. Over the decades, our organization has worked tirelessly on protecting and restoring our local streams and the Potomac River, which as you know ultimately affect the Chesapeake Bay.

In the greater Washington DC area, the contribution of nitrogen, phosphorous, and sediment are recognized as the major pollutants of the Bay system, and therefore, are primarily responsible for the decline of the Bay. We have nitrogen in our surface waters as a result of stormwater runoff and air deposition; phosphorous is also due to stormwater runoff, while sediment is carried in runoff and in-stream erosion caused by changes in hydrology as impervious surfaces have increased and stormwater is not adequately treated or contained on-site. The proposed Chesapeake Bay TMDL will set regulatory limits on these pollutants, which will greatly aid in the cleanup of our streams, rivers, and the Bay.

We recognize both the legal and economic reasons for the EPA to move forward at this time with a Chesapeake TMDL. Voluntary efforts have failed to restore the Bay; they have merely kept further degradation from occurring. Only 24% of the Bay's water quality goals, set by the Chesapeake Bay Agreements, were met in 2009. According to the Choose Clean Water Coalition: *The latest estimate for meeting the nutrient reductions necessary to restore the Bay, at the current pace of the voluntary programs, is in 2050. That would be 67 years from when the Bay Program began in 1983.* Obviously, this is inadequate. Agriculture and urban runoff must be addressed

equally. We need to move forward in a timely manner to protect the waters of Chesapeake Bay Watershed. Therefore, we support the implementation of the Chesapeake Bay TMDL.

Regards,

Neal Fitzpatrick
Executive Director
Audubon Naturalist Society